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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

|                           |   |                               |
|---------------------------|---|-------------------------------|
| United States of America, | ) |                               |
|                           | ) |                               |
| Plaintiff,                | ) |                               |
|                           | ) |                               |
| vs.                       | ) |                               |
|                           | ) |                               |
| Shane Twigg,              | ) | Case No.: A-05-0041 CR. (RRB) |
|                           | ) |                               |
| Defendant.                | ) |                               |
| _____                     | ) |                               |

**NON-OPPOSED MOTION TO PRODUCE DEFENDANT'S JUVENILE RECORDS**

A period of excludable delay under 18 U.S.C. 3161(h)(1)(F) may occur as a result of the filing/granting/denying of this motion.

COMES NOW, Shane Twigg, by and through counsel, Robert M. Herz, of the Law Offices of Robert Herz, P.C., and hereby moves this court to issue an order compelling the state of Alaska, Division of Juvenile Justice to produce a copy of the defendant's, Mr. Twigg's, entire juvenile file to the Law Offices of Robert Herz, P.C. Counsel previously requested this information in correspondence to the Division of Juvenile Justice on June 6, 2006 and accompanying this request was a consent and release, signed by Mr. Twigg and notarized as well. The Division of Juvenile Justice never responded to the request.

The information requested is necessary for Mr. Twigg to independently investigate information contained in the draft pre-sentence report pertaining to documents, reports,

letters, correspondence, and memos in the possession and control of the state of Alaska, Division of Juvenile Justice, and referred to in the draft pre-sentence report that pertaining to alleged issues that arose while Mr. Twigg was a juvenile and which could affect his sentence or his Bureau of Prisons placement.

Counsel has spoken with AUSA David Nesbett and he does not oppose this motion.

DATED at Anchorage, Alaska, this 27th day of July 2006.

THE LAW OFFICES OF ROBERT HERZ, PC

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 27th day of July 2006, a true and correct copy of the Motion to Continue Sentencing was faxed to the following: USPO Scott Kelley (271-3060) and served electronically on the US Attorney By: s/Robert Herz